

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

NEWSPAPER, NEWSPRINT, MAGAZINE)
AND FILM DELIVERY DRIVERS, HELPERS,)
AND HANDLERS, INTERNATIONAL)
BROTHERHOOD OF TEAMSTERS,)
LOCAL UNION NO. 211,)

Plaintiff,)

Civil Action No. 2:19-cv-01472-LPL

vs.)

PG PUBLISHING CO., INC. d/b/a/)
PITTSBURGH POST GAZETTE,)

Defendant.)

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

AND NOW COMES Plaintiff, Newspaper, Newsprint, Magazine, and Film Delivery Drivers, Helpers, and Handlers, International Brotherhood of Teamsters, Local Union No. 211, by and through their undersigned counsel, Jubelirer, Pass & Intrieri, P.C., pursuant to Fed. R. Civ. P. 65 and, for the reasons set forth more fully in the Verified Complaint, the Affidavit of Joseph A. Molinero and the attached memorandum of law, respectfully requests that the Court grant its Motion for Temporary Restraining Order and Preliminary Injunction as follows:

1. Upon return of an Order to Show Cause, the Court issue an injunction pendente lite enjoining and restraining Defendant from refusing to maintain the status quo under the CBA regarding healthcare coverage, manpower, shift scheduling, wages and layoffs while Plaintiff's grievance remains pending;

2. Upon return of an Order to Show Cause, the Court issue an injunction pendente lite directing Defendant to maintain the status quo regarding healthcare coverage, manpower, shift

scheduling, wages and layoffs as required contractually by the CBA pending the outcome of the contractual grievance process;

3. That on a final determination hereof, the Court issue a permanent injunction directing Defendant to maintain the status quo regarding healthcare coverage, manpower, shift scheduling, wages and layoffs as required contractually by the CBA and statutorily under the National Labor Relations Act pending the outcome of the contractual grievance process;

4. In support of the Motion for Injunctive Relief, the Affidavit and Exhibits attached thereto of Joseph A. Molinero is filed herein.

5. Plaintiffs have hand delivered a copy of the Complaint, Motion, Affidavit, Proposed Order and Memorandum of Law upon Defendant and provided a courtesy copy of same by e-mail to Defendant's counsel.

6. An award of Plaintiff's reasonable attorneys' fees and costs;

7. Such further relief as the Court deems just and proper.

Respectfully submitted,

JUBELIRER, PASS & INTRIERI, P.C.

BY: /s/ Joseph J. Pass

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